November 15, 2004

Mr. David A. Christian
Senior Vice President
and Chief Nuclear Officer
Dominion Nuclear Connecticut, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION, REGARDING MILLSTONE POWER STATION, UNIT NO. 2, FIVE-YEAR EXTENSION OF TYPE A TEST INTERVAL (TAC NO. MC3747)

Dear Mr. Christian:

By letter dated July 6, 2004, as supplemented by letter dated September 21, 2004, you submitted a proposed risk informed technical specification change five-year extension of Type A test interval.

The Nuclear Regulatory Commission staff reviewed the information you provided and determined that additional information is required in order to complete the evaluation. The additional information requested is attached. If you have any questions, please contact me at (301) 415-1484.

Sincerely,

/RA/

Victor Nerses, Senior Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-336

Enclosure: As stated

cc w/encl: See next page

Millstone Power Station, Unit No. 2

cc:

Lillian M. Cuoco, Esquire
Senior Counsel
Dominion Resources Services, Inc.
Building 475, 5th Floor
Rope Ferry Road
Waterford, CT 06385

Edward L. Wilds, Jr., Ph.D.
Director, Division of Radiation
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

First Selectmen
Town of Waterford
15 Rope Ferry Road
Waterford, CT 06385

Charles Brinkman, Director
Washington Operations Nuclear Services
Westinghouse Electric Company
12300 Twinbrook Pkwy, Suite 330
Rockville, MD 20852

Senior Resident Inspector
Millstone Power Station
c/o U.S. Nuclear Regulatory Commission
P.O. Box 513
Niantic, CT 06357

Mr. J. Alan Price
Site Vice President
Dominion Nuclear Connecticut, Inc.
Building 475, 5th Floor
Rope Ferry Road
Waterford, CT 06385

Mr. John Markowicz
Co-Chair
Nuclear Energy Advisory Council
9 Susan Terrace
Waterford, CT 06385

Mr. Evan W. Woollacott
Co-Chair
Nuclear Energy Advisory Council
128 Terry's Plain Road
Simsbury, CT 06070

Ms. Nancy Burton
147 Cross Highway
Redding Ridge, CT 00870

Mr. Chris L. Funderburk
Director, Nuclear Licensing and
Operations Support
Dominion Resources Services, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

Mr. David W. Dodson
Licensing Supervisor
Dominion Nuclear Connecticut, Inc.
Building 475, 5th Floor
Rope Ferry Road
Waterford, CT 06385

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SUBJECT: REQUEST FOR ADDITIONAL INFORMATION, REGARDING MILLSTONE POWER STATION, UNIT NO. 2, FIVE-YEAR EXTENSION OF TYPE A TEST INTERVAL (TAC NO. MC3747)

Dear Mr. Christian:

By letter dated July 6, 2004, as supplemented by letter dated September 21, 2004, you submitted a proposed risk informed technical specification change five-year extension of Type A test interval.

The Nuclear Regulatory Commission staff reviewed the information you provided and determined that additional information is required in order to complete the evaluation. The additional information requested is attached. If you have any questions, please contact me at (301) 415-1484.

Sincerely,
/RA/
Victor Nerses, Senior Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-336

Enclosure: As stated

cc w/encl: See next page

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ACCESSION NUMBER: ML043070054

OFFICE	PDI-2/PM	PDI-2/LA	SPSB/SC	PDI-2/SC(A)
NAME	VNerses	CRaynor	MRubin	DCollins
DATE	11/15/04	11/10/04	10/15/04	11/15/04

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REQUEST FOR ADDITIONAL INFORMATION

RELATED TO DOMINION NUCLEAR CONNECTICUT, INC.

MILLSTONE POWER STATION, UNIT NO. 2

FIVE-YEAR EXTENSION OF TYPE A TEST INTERVAL

DOCKET NO. 50-336

By letter dated July 6, 2004, as supplemented by letter dated September 21, 2004, Dominion Nuclear Connecticut, Inc. submitted a proposed risk informed technical specification change five-year extension of Type A test interval. The Nuclear Regulatory Commission (NRC) staff reviewed the information provided and determined that the following additional information is required in order to complete the evaluation.

1. The risk assessment methodology used to support the integrated leak rate test (ILRT) interval extension for Millstone Power Station, Unit No. 2 (MP2) is based on a methodology developed by the Electric Power Research Institute (EPRI) in 1994. A revision to this methodology was developed for the Nuclear Energy Institute (NEI) by EPRI in 2001, and corrected/improved the original methodology in several areas. Based on an NRC staff assessment, the revised methodology (referred to as the NEI Interim Guidance) would indicate larger risk impacts (e.g., Δlarge early release frequency (LERF)) for the ILRT interval extension than the original. In view of the non-conservative nature of the original EPRI methodology, please provide a reassessment of the risk impacts of the requested change for MP2 based on the NEI Interim Guidance. In reporting risk results (for Δperson-rem, ΔLERF, and Δconditional containment failure probability), include results corresponding to a change in test frequency from 3 tests in 10 years to 1 test in 15 years.

2. Table 3 of Attachment 2 of your submittal, provides the estimated population dose for each accident class as well as the total population dose summed over all accident classes. The population doses assigned to Class 7 and 8 are substantially higher than values reported for similar release categories in the severe accident mitigation alternative (SAMA) analysis submitted in support of the MP2 license renewal. Specifically, for early and late containment failures (Class 7), Table 3 indicates a dose of 1.9E6 person-rem, whereas Table F.1-4 of the SAMA analysis indicates a maximum dose of 7.04E5 person-rem. For containment bypass (Class 8), Table 3 indicates a dose of 4.96E6 person-rem, whereas Table F.1-4 of the SAMA analysis indicates a maximum dose of 3.9E6 person-rem. The total population dose in Table 3 (123 person-rem per year) is also substantially higher than that in the SAMA analysis (17.4 person-rem per year). Use of the higher dose values leads to an under-estimate of the percent increase in the population dose resulting from the ILRT interval extension. Please reconcile the population dose values with those in the SAMA analysis, and provide a reassessment of the impact of the ILRT interval extension on population dose based on appropriate population dose values.

Enclosure